



COPY

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7 Telephone: (949) 502-2870

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9 Attorneys for Plaintiff,

10 Andrea Carter-Bowman Ltd.

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 ANDREA CARTER-BOWMAN Ltd., a
14 United Kingdom Company,

15 Plaintiff,

16 v.

17 MARIO LAVANDEIRA, dba Perez Hilton,
18 an individual; and DOES 1-10
19 INCLUSIVE,

20 Defendants.

Case No. **CV 12 - 05461 RSWL (MANx)**

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

By Fax

BY _____

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

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COMPLAINT

1 Andrea Carter-Bowman Ltd. (“Carter-Bowman”), by and through its attorneys of
2 record, complains against MARIO LAVANDEIRA, dba Perez Hilton (“Lavandeira”) and
3 DOES 1 through 10 (collectively, “Defendants”) as follows:

4 5 **JURISDICTION AND VENUE**

6 1. This is a civil action against Defendants for their acts of copyright
7 infringement in violation of the United States Copyright Act, 17 U.S.C. §§ 101 *et seq.* This
8 Court has subject matter jurisdiction over the copyright infringement under 28 U.S.C. §
9 1331, 17 U.S.C. § 501(a), and 28 U.S.C. § 1338(a).

10 2. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28
11 U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be
12 found and transact business in this Judicial District, and the injury suffered by Plaintiff took
13 place in this Judicial District. Defendants are subject to the general and specific personal
14 jurisdiction of this Court because of their contacts with the State of California.

15 16 **PARTIES**

17 3. Plaintiff Carter-Bowman is a foreign company with its principal place of
18 business in London, England, and the owner of the copyrights to the photographs at issue
19 herein.

20 4. Plaintiff is informed and believes and, upon such, alleges that Lavandeira is an
21 individual residing in California and doing business under the name Perez Hilton as the
22 sole owner and operator of the Internet website located at <http://cocoperez.com/>.

23 5. DOES 1 through 10, inclusive, are unknown to Plaintiff, who therefore sues
24 said Defendants by such fictitious names. Plaintiff will ask leave of Court to amend this
25 Complaint and insert the true names and capacities of said Defendants when the same have
26 been ascertained. Plaintiff is informed and believes and, upon such, alleges that each of the
27 Defendants designated herein as a “DOE” is legally responsible in some manner for the
28

1 events and happenings herein alleged, and that Plaintiff's damages as alleged herein were
 2 proximately caused by such Defendants.

3 4 **STATEMENT OF FACTS**

5 ***A. The Photos Forming the Subject Matter of This Dispute***

6 6. Ms. Andrea Carter-Bowman is a renowned fashion and celebrity photographer
 7 based in London, England. Plaintiff Carter-Bowman is a business that holds the copyrights
 8 to the photos at issue. Ms. Carter-Bowman's great efforts to meticulously hone her craft
 9 have received widespread acclaim and recognition. Indeed, Carter-Bowman's client roster
 10 is decidedly "A" list and includes some of most highly respected media and fashion
 11 companies in the world, such as Disney, Loreal, Maire Claire, British Vogue, and ELLE,
 12 among many others. Carter-Bowman's experience goes beyond that of media and fashion
 13 to include the commissioned photography of numerous models and celebrities, including
 14 actress Emma Watson of *Harry Potter* fame.

15 7. Charlotte "Lottie" Moss is the 14-year-old half-sister of internationally
 16 recognized supermodel Kate Moss. With her noted pedigree and ethereal good-looks,
 17 Lottie enjoys a promising future in editorial spreads, on the runway and in
 18 advertisements—if she chooses to enter the public spotlight and pursue a modeling career.
 19 With this decision in mind, Lottie decided to assay her modeling skills with a test shoot.
 20 As a top-tier fashion photographer, Carter-Bowman was the logical choice to lead the
 21 session.

22 8. Entrusted with the task of curating this ingénue's first professional images,
 23 Carter-Bowman emphatically delivered. Plaintiff's captivating shots of Lottie (hereinafter,
 24 collectively "the Photos"), which form the subject matter of this suit, are attached hereto as
 25 Exhibit A.

26 9. Carter-Bowman's images of Lottie exceeded expectations. Despite being
 27 borne from a test shoot, substantial potential licensing opportunities were anticipated.

B. The Defendants and their Infringement

10. Plaintiff is informed and believes and, upon such, alleges that, under the name “Perez Hilton,” Defendant Lavandeira owns and operates a commercial “fashion” blog located at <http://cocoperez.com/> (the “Website”). Lavandeira also owns and operates other successful websites, including PerezHilton.com.

11. As stated on the Website’s “About” page, “Perez Hilton is the Internet’s most notorious gossip columnist,” and “Perez was named the #1 Web celebrity for 2007 by Forbes Magazine and as one of the 15 most influential Hispanics in the US by People in Espanol.” <http://cocoperez.com/about>.

12. The Website is a self-described “fashion blog from Perez Hilton integrating content, shopping, and celebrities to create a unique community for trendsetters, fashion industry influencers, and celebrities to go to for inspiration.” <http://cocoperez.com/about>. “CocoPerez.com will feature Celebrity red carpet and ‘on the street’ looks, fashion industry news, how to get celeb looks for less, where to find fashions seen on TV and in movies, and interviews with ‘of the now’ fashion designers.” *Id.*

13. Plaintiff is informed and believes and, upon such, alleges that the Website generates significant revenue from the sale of advertising.

14. Despite Lavandeira’s economic resources and sophistication on basic matters of intellectual property law, Defendants have, on information and belief, violated federal law by willfully infringing the copyrights of Carter-Bowman to at least five different photographs from the Lottie Moss test shoot on the Website. Specifically, in or around November and December 2011, Defendants reproduced, distributed and publicly displayed at least five of said Photos, and derivatives thereof, on the Website without permission, consent, or license from Carter-Bowman, the rightsholder to the Photos.

15. In the marketplace, celebrity photos such as those at issue in this case carry tremendous monetary value. Carter-Bowman crafts images of celebrities at a significant cost and licenses these images to various third parties to create highly sought after feature spreads and/or advertising online and offline. The exclusive nature of the Photos had

1 substantial monetary value for its author, which was irreparably harmed by the actions of
2 Defendants.

3 16. On information and belief, Defendants herein have driven massive traffic to
4 their web properties in part due to the presence of the sought after and searched-for
5 celebrity images. All of this traffic translates into significant ill-gotten commercial
6 advantage and revenue generation for Defendants as a direct consequence of their
7 infringing actions.

8
9 **FIRST CLAIM FOR RELIEF**

10 **(Copyright Infringement, 17 U.S.C. § 501)**

11 17. Plaintiff Carter-Bowman incorporates here by reference the allegations in
12 paragraphs 1 through 19 above.

13 18. Carter-Bowman is the owner of the copyrights to the Photos, which
14 substantially consist of material wholly original with Plaintiff and which constitute
15 copyright subject matter under the laws of the United States. Carter-Bowman has complied
16 in all respects with the Copyright Act and all of the laws of the United States governing
17 copyrights. The Photos have been timely registered with the United States Copyright
18 Office. Attached hereto as Exhibit B is a Copyright Registration Certificate for the Photos.

19 19. Defendants have directly, vicariously and/or contributorily infringed, and
20 unless enjoined, on information and belief, will continue to infringe Carter-Bowman's
21 copyrights by reproducing, displaying, distributing and utilized the Photos for purposes of
22 trade in violation of 17 U.S.C. § 501 *et seq.*

23 20. Defendants have willfully infringed, and unless enjoined, on information and
24 belief, will continue to infringe Carter-Bowman's copyrights by knowingly reproducing,
25 displaying, distributing and utilizing the Photos for purposes of trade.

26 21. These acts of infringement are willful because, *inter alia*, the Defendants are
27 sophisticated and have full knowledge of the strictures of federal copyright law and the
28 basic requirements for licensing the use of copyrighted content for commercial

1 exploitation, especially given past lawsuits against Lavandeira for infringement of celebrity
2 photographs. Indeed, Defendants demand nothing less of others who use *their* copyrighted
3 content. Further, prior to the reproduction, public distribution and public display of the
4 Photos by Defendants, the images were stored on Carter-Bowman's website, which
5 contains specific terms of use and copyright notice. Specifically, Plaintiff's site states: "All
6 Photographs herein are the exclusive property of Andrea Carter-Bowman and may not be
7 used or reproduced in any manner whatsoever without the express permission of Andrea
8 Carter-Bowman. © 2011 Andrea Carter-Bowman. All Rights Reserved."

9 22. Defendants, despite such copyright notice and terms of use, reproduced,
10 publicly distributed and publicly displayed the Photos on the Website.

11 23. Defendants have received substantial benefits in connection with the
12 unauthorized reproduction, display, distribution and utilization of the Photos for purposes
13 of trade, including by increasing the traffic to the Website and, thus, increasing the
14 advertising fees realized.

15 24. The actions of Defendants were and are continuing to be performed without
16 the permission, license or consent of Carter-Bowman.

17 25. The wrongful acts of Defendants have caused, and are causing, great injury to
18 Plaintiff, of which damages cannot be accurately computed, and unless this Court restrains
19 Defendants from further commission of said acts, Carter-Bowman will suffer irreparable
20 injury, for all of which it is without an adequate remedy at law. Accordingly, Plaintiff
21 seeks a declaration that Defendants are infringing Carter-Bowman's copyrights and an
22 order under 17 U.S.C. § 502 enjoining Defendants from any further infringement of
23 Plaintiff's copyrights.

24 26. As a result of the acts of Defendants alleged herein, Carter-Bowman has
25 suffered and is suffering substantial damage to its business in the form of diversion of
26 trade, loss of profits, injury to goodwill and reputation, and the dilution of the value of its
27 rights, all of which are not yet fully ascertainable.

1 improperly or unlawfully infringes upon Plaintiff's copyrights pursuant to 17 U.S.C. §§
2 504 (a)(1) & (b).

3 4. Requiring Defendants to account for and pay over to Plaintiff all profits
4 derived by Defendants from their acts of copyright infringement and to reimburse Plaintiff
5 for all damages suffered by Plaintiff by reasons of Defendant's acts, pursuant to 17 U.S.C.
6 §§ 504 (a)(1) & (b).

7 5. Actual damages for copyright infringement pursuant to 17 U.S.C. §§
8 504 (a)(1) & (b).

9 6. That Plaintiff be awarded any such other and further relief as the Court
10 may deem just and appropriate.

11
12 Dated: June 22, 2012

ONE LLP

13
14 By: 

15 Marc S. Williams, Esq.
16 Attorneys for Plaintiff,
17 Andrea Carter-Bowman Ltd.
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DEMAND FOR JURY TRIAL

Plaintiff Andrea Carter-Bowman hereby demands trial by jury of all issues so triable under the law.

Dated: June 22, 2012

ONE LLP

By: _____



Marc S. Williams, Esq.
Attorneys for Plaintiff,
Andrea Carter-Bowman Ltd.

EXHIBIT A











EXHIBIT B

EXHIBIT B

Registration #: VA0001798041

Service Request #: 1-687052081



Lickerish LTD
Melanie Marson
36 Eastcastle Street
London, W1W 8DP United Kingdom

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-798-041

Effective date of
registration:
November 22, 2011

Title

Title of Work: Andrea Carter-Bowman Photo Shoot - Lottie Moss First Modeling Test - 15 October 2011

Contents Titles: ACB_lottie_15-10-11 0199_1CROP
ACB_lottie_15-10-11 019_1CROP
ACB_lottie_15-10-11 030_1CROP
ACB_lottie_15-10-11 036_1CROP
ACB_lottie_15-10-11 060_1CROP
ACB_lottie_15-10-11 0677_1CROP
ACB_lottie_15-10-11 067_1CROP
ACB_lottie_15-10-11 071_1CROP
ACB_lottie_15-10-11 104_1CROP
ACB_lottie_15-10-11 149CROP

Completion/Publication

Year of Completion: 2011

Date of 1st Publication: November 2, 2011

Nation of 1st Publication: United Kingdom

Author

■ **Author:** Andrea Carter-Bowman

Author Created: photograph(s)

Work made for hire: No

Citizen of: United Kingdom

Domiciled in: United Kingdom

Copyright claimant

Copyright Claimant: Andrea Carter-Bowman

Flat 1, 1 Beaufort Street, London, SW3 5AQ, United Kingdom

Rights and Permissions

Organization Name: Lickerish LTD

Name: Melanie Marson

Telephone: +44-020-7323 1999 (0)

Address: 000 000 0000
36 Eastcastle Street

London, W1W 8DP United Kingdom

Certification

Name: Joe G. Naylor

Date: November 22, 2011

Applicant's Tracking Number: C1024



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Ronald S. W. Lew and the assigned discovery Magistrate Judge is Margaret A. Nagle.

The case number on all documents filed with the Court should read as follows:

CV12- 5461 RSWL (MANx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:

Marc S. Williams (SBN 198913)

mwilliams@onellp.com

ONE LLP, 4000 MacArthur Blvd., W Twr, Ste 1100

Newport Beach, CA 92660 Tel: 949-502-2870

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIAANDREA CARTER-BOWMAN Ltd., a
United Kingdom Company,

PLAINTIFF(S)

v.

MARIO LAVANDEIRA, dba Perez Hilton, an
individual; and DOES 1-10 INCLUSIVE,

DEFENDANT(S).

CASE NUMBER

CV 12 - 05461 RSWL (MANx)

SUMMONS

TO: DEFENDANT(S): MARIO LAVANDEIRA, dba Perez Hilton, an individual; and DOES 1-10
INCLUSIVE

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Marc S. Williams of One LLP _____, whose address is 4000 MacArthur Blvd., West Tower, Suite 1100, Newport Beach, CA 92660 _____. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 6/22/12By: Denise Vo**DENISE VO**

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

COPY

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

By Fax

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> ANDREA CARTER-BOWMAN Ltd., a United Kingdom Company	DEFENDANTS MARIO LAVANDEIRA, dba Perez Hilton, an individual; and DOES 1-10 INCLUSIVE,
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) ONE LLP, 4000 MacArthur Blvd., West Tower, Suite 1100, Newport Beach, CA 92660; Tel: 949-502-2870; Fax: 949-258-5081	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:35%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:35%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)
☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)
CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ To be determined

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Copyright Infringement (17 U.S.C. §§ 101 et seq)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 490 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PERSONAL FREEDOMS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FOREIGNER/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV 12 - 05461 RSWL (MANx)

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
 If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
 If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	United Kingdom

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER): Marcelina Lopez Date June 22, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))